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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION

In re
THE LITIGATION PRACTICE GROUP,
P.C.,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. No. 8:25-ap-01105-SC

**DEFENDANT SOLOMON FEIG'S
ANSWER TO COMPLAINT AND
DEMAND FOR JURY TRIAL**

DATE:
TIME: [No Hearing Required]
PLACE:

1 RICHARD A. MARSHACK, Trustee of the
2 LPG Liquidation Trust,

3 Plaintiff,

4 v.

5 WORLD GLOBAL FUND, LLC *et al.*

6 Defendants.
7

8 Defendant Solomon Feig (“Feig”) hereby answers the *Complaint for (1) Avoidance,*
9 *Recovery, And Preservation of 2-Year Actual Fraudulent Transfers; (2) Avoidance, Recovery,*
10 *And Preservation of 2-Year Constructive Fraudulent Transfers; (3) Demand For Accounting*
11 *Against World Global Fund, LLC, OptimumBank Holdings Inc., OptimumBank, And*
12 *OptimumBank.com; (4) Turnover Of Estate Property; (5) Fraud And/Or Conversion/Theft*
13 *Committed By World Global, LLC, Dembitzer, Feig, The Alter Egos, And The Dembitzer Alter*
14 *Egos – The Fraudulent ACH Transactions; (6) Fraud And/Or Conversion/Theft Committed By*
15 *World Global, LLC, Dembitzer, Feig, The Alter Egos, And The Dembitzer – Unreimbursed*
16 *Funds From The MCA Agreements; (7) Aiding And Abetting Fraud And/Or Conversion/Theft By*
17 *Moise Gubin, OptimumBank Holdings Inc., OptimumBank, OptimumBank.com; (8) Aiding And*
18 *Abetting By Moishe Gubin, OptimumBank Holdings Inc., OptimumBank, OptimumBank.com;*
19 *And (9) Conspiracy To Commit Fraud (the “Complaint”)* and admits, denies, and avers as
20 follows:

21 **STATEMENT OF JURISDICTION, NATURE OF PROCEEDING, AND VENUE**

22 1. The allegations of paragraph 1 of the Complaint do not require an answer because
23 they are statements of law. To the extent an answer is required, Feig lacks knowledge or
24 information sufficient to form a belief as to the truth of the allegations of paragraph 1, and on
25 that basis denies them.

26 2. The allegations of paragraph 2 of the Complaint do not require an answer because
27 they are statements of law. To the extent an answer is required, Feig lacks knowledge or
28

1 information sufficient to form a belief as to the truth of the allegations of paragraph 2, and on
2 that basis denies them.

3 3. The allegations of paragraph 3 of the Complaint do not require an answer because
4 they are statements of law. To the extent an answer is required, Feig does not consent to the
5 entry of a final judgment or order by the bankruptcy court.

6 4. The allegations of paragraph 4 of the Complaint do not require an answer because
7 they are statements of law. To the extent an answer is required, Feig lacks knowledge or
8 information sufficient to form a belief as to the truth of the allegations of paragraph 4, and on
9 that basis denies them.

10 **THE PARTIES**

11 5. The allegations of paragraph 5 of the Complaint do not require an answer because
12 they are statements of law. To the extent an answer is required, Feig is without sufficient
13 knowledge or information to form a belief as to the truth of the allegations contained in
14 paragraph 5, and on that basis denies them.

15 6. Feig is without sufficient knowledge or information sufficient to form a belief as
16 to the truth of the allegations contained in paragraph 6 of the Complaint, and on that basis denies
17 them.

18 7. Feig is without sufficient knowledge or information to form a belief as to the truth
19 of the allegations contained in paragraph 7 of the Complaint, and on that basis denies them.

20 8. Feig is without sufficient knowledge or information to form a belief as to the truth
21 of the allegations contained in paragraph 8 of the Complaint, and on that basis denies them.

22 9. Feig denies the allegations contained in paragraph 9 of the Complaint.

23 10. Feig denies the allegations contained in paragraph 10 of the Complaint.

24 11. Feig is without sufficient knowledge or information to form a belief as to the truth
25 of the allegations contained in paragraph 11 of the Complaint, and on that basis denies them.

26 12. Feig denies the allegations contained in paragraph 12 of the Complaint, except
27 admits that he resides in Brooklyn, New York.

1 13. Feig is without sufficient knowledge or information to form a belief as to the truth
2 of the allegations contained in paragraph 13 of the Complaint, and on that basis denies them.

3 14. Feig is without sufficient knowledge or information to form a belief as to the truth
4 of the allegations contained in paragraph 14 of the Complaint, and on that basis denies them.

5 15. Feig is without sufficient knowledge or information to form a belief as to the truth
6 of the allegations contained in paragraph 15 of the Complaint, and on that basis denies them.

7 16. Feig is without sufficient knowledge or information to form a belief as to the truth
8 of the allegations contained in paragraph 16 of the Complaint, and on that basis denies them.

9 17. Feig is without sufficient knowledge or information to form a belief as to the truth
10 of the allegations contained in paragraph 17 of the Complaint, and on that basis denies them.

11 18. Feig is without sufficient knowledge or information to form a belief as to the truth
12 of the allegations contained in paragraph 18 of the Complaint, and on that basis denies them.

13 19. Feig is without sufficient knowledge or information to form a belief as to the truth
14 of the allegations contained in paragraph 19 of the Complaint, and on that basis denies them.

15 20. Feig is without sufficient knowledge or information to form a belief as to the truth
16 of the allegations contained in paragraph 20 of the Complaint, and on that basis denies them.

17 21. Feig is without sufficient knowledge or information to form a belief as to the truth
18 of the allegations contained in paragraph 21 of the Complaint, and on that basis denies them.

19 22. Feig is without sufficient knowledge or information to form a belief as to the truth
20 of the allegations contained in paragraph 22 of the Complaint, and on that basis denies them.

21 23. Feig is without sufficient knowledge or information to form a belief as to the truth
22 of the allegations contained in paragraph 23 of the Complaint, and on that basis denies them.

23 24. Feig is without sufficient knowledge or information to form a belief as to the truth
24 of the allegations contained in paragraph 24 of the Complaint, and on that basis denies them.

25 25. Feig is without sufficient knowledge or information to form a belief as to the truth
26 of the allegations contained in paragraph 25 of the Complaint, and on that basis denies them.

1 26. Feig is without sufficient knowledge or information to form a belief as to the truth
2 of the allegations contained in paragraph 26 of the Complaint, and on that basis denies them.

3 27. Feig is without sufficient knowledge or information to form a belief as to the truth
4 of the allegations contained in paragraph 27 of the Complaint, and on that basis denies them.

5 28. Feig is without sufficient knowledge or information to form a belief as to the truth
6 of the allegations contained in paragraph 28 of the Complaint, and on that basis denies them.

7 29. Feig is without sufficient knowledge or information to form a belief as to the truth
8 of the allegations contained in paragraph 29 of the Complaint, and on that basis denies them.

9 30. Feig is without sufficient knowledge or information to form a belief as to the truth
10 of the allegations contained in paragraph 30 of the Complaint, and on that basis denies them.

11 31. Feig is without sufficient knowledge or information to form a belief as to the truth
12 of the allegations contained in paragraph 31 of the Complaint, and on that basis denies them.

13 32. Feig is without sufficient knowledge or information to form a belief as to the truth
14 of the allegations contained in paragraph 32 of the Complaint, and on that basis denies them.

15 33. Feig is without sufficient knowledge or information to form a belief as to the truth
16 of the allegations contained in paragraph 33 of the Complaint, and on that basis denies them.

17 34. Feig is without sufficient knowledge or information to form a belief as to the truth
18 of the allegations contained in paragraph 34 of the Complaint, and on that basis denies them.

19 35. Feig is without sufficient knowledge or information to form a belief as to the truth
20 of the allegations contained in paragraph 35 of the Complaint, and on that basis denies them.

21 36. Feig is without sufficient knowledge or information to form a belief as to the truth
22 of the allegations contained in paragraph 36 of the Complaint, and on that basis denies them.

23 37. Feig is without sufficient knowledge or information to form a belief as to the truth
24 of the allegations contained in paragraph 37 of the Complaint, and on that basis denies them.

25 38. Feig is without sufficient knowledge or information to form a belief as to the truth
26 of the allegations contained in paragraph 38 of the Complaint, and on that basis denies them.

39. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint, and on that basis denies them.

40. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint, and on that basis denies them.

41. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint, and on that basis denies them.

42. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 42 of the Complaint, and on that basis denies them.

43. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 43 of the Complaint, and on that basis denies them.

RELEVANT DEFENDANT NAMED IN THE 1046 ACTION

44. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint, and on that basis denies them.

GENERAL ALLEGATIONS

A. LPG's BANKRUPTCY CASE

45. Feig admits the allegations contained in the first sentence of paragraph 45 of the Complaint. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in the second sentence of paragraph 45 of the Complaint, and on that basis denies them.

46. The allegations contained in paragraph 46 of the Complaint do not require an answer because they purport to describe court filings. To the extent an answer is required, Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 46 of the Complaint, and refers to the documents cited for their complete contents.

47. The allegations contained in paragraph 47 of the Complaint do not require an answer because they purport to describe court filings. To the extent an answer is required, Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations

1 contained in paragraph 47 of the Complaint, and refers to the documents cited for their complete
2 contents.

3 48. The allegations contained in paragraph 48 of the Complaint do not require an
4 answer because they purport to describe court filings. To the extent an answer is required, Feig
5 is without sufficient knowledge or information to form a belief as to the truth of the allegations
6 contained in paragraph 48 of the Complaint, and refers to the documents cited for their complete
7 contents.

8 49. The allegations contained in paragraph 49 of the Complaint do not require an
9 answer because they are statements of law. To the extent a response is required, Feig is without
10 sufficient knowledge or information to form a belief as to the truth of the allegations contained in
11 paragraph 49 of the Complaint, and on that basis denies them.

12 50. Feig is without sufficient knowledge or information to form a belief as to the truth
13 of the allegations contained in paragraph 50 of the Complaint, and on that basis denies them.

14 **B. LPG**

15 51. Feig is without sufficient knowledge or information to form a belief as to the truth
16 of the allegations contained in paragraph 51 of the Complaint, and on that basis denies them.

17 52. Feig is without sufficient knowledge or information to form a belief as to the
18 truth of the allegations contained in paragraph 52 of the Complaint, and on that basis denies
19 them.

20 53. Feig is without sufficient knowledge or information to form a belief as to the truth
21 of the allegations contained in paragraph 53 of the Complaint, and on that basis denies them.

22 54. Feig is without sufficient knowledge or information to form a belief as to the truth
23 of the allegations contained in paragraph 54 of the Complaint, and on that basis denies them.

24 55. Feig is without sufficient knowledge or information to form a belief as to the truth
25 of the allegations contained in paragraph 55 of the Complaint, and on that basis denies them.

26 56. Feig is without sufficient knowledge or information to form a belief as to the truth
27 of the allegations contained in paragraph 56 of the Complaint, and on that basis denies them.
28

57. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 57 of the Complaint, and on that basis denies them.

58. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 58 of the Complaint, and on that basis denies them.

59. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 59 of the Complaint, and on that basis denies them.

60. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 60 of the Complaint, and on that basis denies them.

61. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 61 of the Complaint, and on that basis denies them.

C. WORLD GLOBAL'S MCA AGREEMENTS

62. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 62 of the Complaint, and on that basis denies them.

63. Feig denies the allegations contained in paragraph 63 of the Complaint.

64. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 64 of the Complaint, and on that basis denies them.

65. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 65 of the Complaint, and on that basis denies them.

66. Feig denies the allegations contained in paragraph 66 of the Complaint.

67. Feig denies the allegations contained in paragraph 67 of the Complaint.

68. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 68 of the Complaint, and on that basis denies them.

69. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 69 of the Complaint, and on that basis denies them.

70. Feig denies the allegations contained in paragraph 70 of the Complaint.

71. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 71 of the Complaint, and on that basis denies them.

72. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 72 of the Complaint, and on that basis denies them.

73. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 73 of the Complaint, and on that basis denies them.

a. Terms of Defendants' MCA Agreements with LPG

74. The allegations contained in paragraph 74 of the Complaint do not require a response because they purport to describe a document attached as Exhibit 1 to the Complaint. To the extent a response is required, Feig refers to the cited document for its complete contents.

75. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 75 of the Complaint, and on that basis denies them.

76. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 76 of the Complaint, and on that basis denies them.

77. The allegations contained in paragraph 77 of the Complaint do not require a response because they purport to describe a document attached as Exhibit 2 to the Complaint. To the extent a response is required, Feig refers to the cited document for its complete contents.

78. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 78 of the Complaint, and on that basis denies them.

79. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 79 of the Complaint, and on that basis denies them.

80. The allegations contained in paragraph 80 of the Complaint do not require a response because they purport to describe a document attached as Exhibit 3 to the Complaint. To the extent a response is required, Feig refers to the cited document for its complete contents.

81. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 81 of the Complaint, and on that basis denies them.

82. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 82 of the Complaint, and on that basis denies them.

83. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 83 of the Complaint, and on that basis denies them.

84. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 84 of the Complaint, and on that basis denies them.

85. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 85 of the Complaint, and on that basis denies them.

86. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 86 of the Complaint, and on that basis denies them.

Feig refers to the cited document for its complete contents.

87. Feig denies the allegations contained in paragraph 87 of the Complaint.

b. Transfers to World Global Pursuant to MCA Agreements

88. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 88 of the Complaint, and on that basis denies them.

89. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 89 of the Complaint, and on that basis denies them.

90. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 90 of the Complaint, and on that basis denies them.

91. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 91 of the Complaint, and on that basis denies them.

92. Feig denies the allegations contained in paragraph 92 of the Complaint.

D. WORLD GLOBAL AS ACH PROCESSOR

93. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 93 of the Complaint, and on that basis denies them.

94. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 94 of the Complaint, and on that basis denies them.

95. Feig denies the allegations contained in paragraph 95 of the Complaint.

1 96. Feig is without sufficient knowledge or information to form a belief as to the truth
2 of the allegations contained in paragraph 96 of the Complaint, and on that basis denies them.

3 97. Feig is without sufficient knowledge or information to form a belief as to the truth
4 of the allegations contained in paragraph 97 of the Complaint, and on that basis denies them.

5 98. Feig is without sufficient knowledge or information to form a belief as to the truth
6 of the allegations contained in paragraph 98 of the Complaint, and on that basis denies them.

7 99. Feig denies the allegations contained in paragraph 99 of the Complaint.

8 100. Feig denies the allegations contained in paragraph 100 of the Complaint.

9 101. Feig is without sufficient knowledge or information to form a belief as to the truth
10 of the allegations contained in paragraph 101 of the Complaint, and on that basis denies them.

11 102. Feig is without sufficient knowledge or information to form a belief as to the truth
12 of the allegations contained in paragraph 102 of the Complaint, and on that basis denies them.

13 103. Feig is without sufficient knowledge or information to form a belief as to the truth
14 of the allegations contained in paragraph 103 of the Complaint, and on that basis denies them.

15 104. Feig denies the allegations contained in paragraph 104 of the Complaint.

16 105. Feig denies the allegations contained in paragraph 105 of the Complaint.

17 106. Feig denies the allegations contained in paragraph 106 of the Complaint.

18 107. Feig denies the allegations contained in paragraph 107 of the Complaint.

19 108. Feig denies the allegations contained in paragraph 108 of the Complaint.

20 109. Feig is without sufficient knowledge or information to form a belief as to the truth
21 of the allegations contained in paragraph 109 of the Complaint, and on that basis denies them.

22 110. Feig is without sufficient knowledge or information to form a belief as to the truth
23 of the allegations contained in paragraph 110 of the Complaint, and on that basis denies them.

24 111. Feig is without sufficient knowledge or information to form a belief as to the truth
25 of the allegations contained in paragraph 111 of the Complaint, and on that basis denies them.

26 112. Feig denies the allegations contained in paragraph 112 of the Complaint.

1 113. Feig is without sufficient knowledge or information to form a belief as to the truth
2 of the allegations contained in paragraph 113 of the Complaint, and on that basis denies them.

3 114. Feig is without sufficient knowledge or information to form a belief as to the truth
4 of the allegations contained in paragraph 114 of the Complaint, and on that basis denies them.

5 115. Feig is without sufficient knowledge or information to form a belief as to the truth
6 of the allegations contained in paragraph 115 of the Complaint, and on that basis denies them.

7 116. Feig is without sufficient knowledge or information to form a belief as to the truth
8 of the allegations contained in paragraph 116 of the Complaint, and on that basis denies them.

9 117. Feig is without sufficient knowledge or information to form a belief as to the truth
10 of the allegations contained in paragraph 117 of the Complaint, and on that basis denies them.

11 118. Feig is without sufficient knowledge or information to form a belief as to the truth
12 of the allegations contained in paragraph 118 of the Complaint, and on that basis denies them.

13 119. Feig is without sufficient knowledge or information to form a belief as to the truth
14 of the allegations contained in paragraph 119 of the Complaint, and on that basis denies them.

15 120. Feig is without sufficient knowledge or information to form a belief as to the truth
16 of the allegations contained in paragraph 120 of the Complaint, and on that basis denies them.

17 121. Feig is without sufficient knowledge or information to form a belief as to the truth
18 of the allegations contained in paragraph 121 of the Complaint, and on that basis denies them.

19 **E. DEMBITZER AND FEIG'S PERSONAL INVOLVEMENT**

20 122. Feig denies the allegations in paragraph 122 of the Complaint.

21 123. Feig denies the allegations in paragraph 123 of the Complaint.

22 124. Feig denies the allegations in paragraph 124 of the Complaint.

23 125. Feig denies the allegations in paragraph 125 of the Complaint.

24 126. Feig denies the allegations in paragraph 126 of the Complaint.

25 127. Feig denies the allegations in paragraph 127 of the Complaint.

26 128. Feig denies the allegations in paragraph 128 of the Complaint.

27 129. Feig denies the allegations in paragraph 129 of the Complaint.

130. Feig denies the allegations contained in paragraph 130 of the Complaint.

131. Feig denies the allegations contained in paragraph 131 of the Complaint.

132. Feig denies the allegations contained in paragraph 132 of the Complaint.

133. Feig denies the allegations contained in paragraph 133 of the Complaint.

134. Feig denies the allegations in paragraph 134 of the Complaint.

135. Feig denies the allegations in paragraph 135 of the Complaint.

136. Feig denies the allegations in paragraph 136 of the Complaint.

137. Feig denies the allegations in paragraph 137 of the Complaint.

138. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 138 of the Complaint, and on that basis denies them.

139. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 139 of the Complaint, and on that basis denies them.

140. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 140 of the Complaint, and on that basis denies them.

141. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 141 of the Complaint, and on that basis denies them.

F. GUBIN AND OPTIMUM'S PARTICIPATION

142. Feig denies the allegations in paragraph 142 of the Complaint.

143. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 143 of the Complaint, and on that basis denies them

144. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 144 of the Complaint, and on that basis denies them.

145. Feig denies the allegations contained in paragraph 145 of the Complaint.

146. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 146 of the Complaint, and on that basis denies them.

147. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 147 of the Complaint, and on that basis denies them.

1 148. Feig is without sufficient knowledge or information to form a belief as to the truth
2 of the allegations contained in paragraph 148 of the Complaint, and on that basis denies them.

3 149. Feig denies the allegations in paragraph 149 of the Complaint.

4 150. Feig denies the allegations in paragraph 150 of the Complaint.

5 151. Feig denies the allegations in paragraph 151 of the Complaint.

6 152. Feig denies the allegations in paragraph 152 of the Complaint.

7 153. Feig denies the allegations in paragraph 153 of the Complaint.

8 154. Feig denies the allegations in paragraph 154 of the Complaint.

9 155. Feig is without sufficient knowledge or information to form a belief as to the truth
10 of the allegations contained in paragraph 155 of the Complaint, and on that basis denies them.

11 156. Feig denies the allegations in paragraph 156 of the Complaint.

12 157. Feig denies the allegations in paragraph 157 of the Complaint.

13 158. Feig denies the allegations in paragraph 158 of the Complaint.

14 159. Feig is without sufficient knowledge or information to form a belief as to the truth
15 of the allegations contained in paragraph 159 of the Complaint, and on that basis denies them.

16 160. Feig denies the allegations in paragraph 160 of the Complaint.

17 161. Feig is without sufficient knowledge or information to form a belief as to the truth
18 of the allegations contained in paragraph 161 of the Complaint, and on that basis denies them.

19 162. Feig is without sufficient knowledge or information to form a belief as to the truth
20 of the allegations contained in paragraph 162 of the Complaint, and on that basis denies them.

21 163. Feig is without sufficient knowledge or information to form a belief as to the truth
22 of the allegations contained in paragraph 163 of the Complaint, and on that basis denies them.

23 164. Feig is without sufficient knowledge or information to form a belief as to the truth
24 of the allegations contained in paragraph 164 of the Complaint, and on that basis denies them.

25 165. Feig is without sufficient knowledge or information to form a belief as to the truth
26 of the allegations contained in paragraph 165 of the Complaint, and on that basis denies them.

1 166. Feig is without sufficient knowledge or information to form a belief as to the truth
2 of the allegations contained in paragraph 166 of the Complaint, and on that basis denies them.

3 167. Feig is without sufficient knowledge or information to form a belief as to the truth
4 of the allegations contained in paragraph 167 of the Complaint, and on that basis denies them.
5 Feig refers to the cited documents for their complete contents.

6 168. Feig denies the allegations in paragraph 168 of the Complaint.

7 169. Feig denies the allegations in paragraph 169 of the Complaint.

8 170. Feig is without sufficient knowledge or information to form a belief as to the truth
9 of the allegations contained in paragraph 170 of the Complaint, and on that basis denies them.

10 171. Feig denies the allegations in paragraph 171 of the Complaint.

11 **G. DEFENDANT'S PONZI SCHEME**

12 172. The allegations contained in paragraph 172 of the Complaint do not require an
13 answer because they are statements of law. To the extent an answer is required, Feig is without
14 sufficient knowledge or information to form a belief as to the truth of the allegations contained in
15 paragraph 172 of the Complaint, and on that basis denies them.

16 173. The allegations contained in paragraph 173 of the Complaint do not require an
17 answer because they are statements of law. To the extent an answer is required, Feig is without
18 sufficient knowledge or information to form a belief as to the truth of the allegations contained in
19 paragraph 173 of the Complaint, and refers to the caselaw cited for its complete contents.

20 174. The allegations contained in paragraph 174 of the Complaint do not require an
21 answer because they are statements of law. To the extent an answer is required, Feig is without
22 sufficient knowledge or information to form a belief as to the truth of the allegations contained in
23 paragraph 174 of the Complaint, and refers to the caselaw cited for its complete contents.

24 175. Feig is without sufficient knowledge or information to form a belief as to the truth
25 of the allegations contained in paragraph 175 of the Complaint, and on that basis denies them.
26 Feig also refers to the case law cited for its complete contents.

1 176. Feig is without sufficient knowledge or information to form a belief as to the truth
2 of the allegations contained in paragraph 176 of the Complaint, and on that basis denies them.

3 177. Feig denies is without sufficient knowledge or information to form a belief as to
4 the truth of the allegations contained in paragraph 177 of the Complaint, and on that basis denies
5 them.

6 **H. LPG's PREPETITION CREDITORS**

7 178. Feig is without sufficient knowledge or information to form a belief as to the truth
8 of the allegations contained in paragraph 178 of the Complaint, and on that basis denies them.

9 179. Feig is without sufficient knowledge or information to form a belief as to the truth
10 of the allegations contained in paragraph 179 of the Complaint, and on that basis denies them.

11 Feig refers to the documents cited for their complete contents.

12 180. The allegations contained in paragraph 180 do not require a response because they
13 purport to describe a document attached as Exhibit 4 to the Complaint. To the extent a response
14 is required, Feig refers to the document cited for its complete contents.

15 181. Feig is without sufficient knowledge or information to form a belief as to the truth
16 of the allegations contained in paragraph 181 of the Complaint, and on that basis denies them.

17 182. The allegations contained in paragraph 182 do not require an answer because they
18 purport to describe a court filing. To the extent a response is required, Feig is without sufficient
19 knowledge or information to form a belief as to the truth of the allegations contained in
20 paragraph 182 of the Complaint, refers to the court filing cited for its complete contents.

21 183. The allegations contained in paragraph 183 do not require an answer because they
22 purport to describe a court filing. To the extent a response is required, Feig is without sufficient
23 knowledge or information to form a belief as to the truth of the allegations contained in
24 paragraph 183 of the Complaint, refers to the court filing cited for its complete contents.

25 184. The allegations contained in paragraph 184 do not require an answer because they
26 are statements of law. To the extent a response is required, Feig is without sufficient knowledge
27
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1 or information to form a belief as to the truth of the allegations contained in paragraph 184 of the
2 Complaint, and on that basis denies them.

3 **FIRST CLAIM FOR RELIEF**

4 **(Avoidance, Recovery, and Preservation of Actual Fraudulent Transfers)**

5 185. In response to paragraph 185 of the Complaint, Feig incorporates his responses to
6 paragraphs 1 through 184 as though set forth in full.

7 186. Feig is without sufficient knowledge or information to form a belief as to the truth
8 of the allegations contained in paragraph 186 of the Complaint, and on that basis denies them.

9 187. Feig is without sufficient knowledge or information to form a belief as to the truth
10 of the allegations contained in paragraph 187 of the Complaint, and on that basis denies them.

11 188. Feig is without sufficient knowledge or information to form a belief as to the truth
12 of the allegations contained in paragraph 188 of the Complaint, and on that basis denies them.

13 189. Feig is without sufficient knowledge or information to form a belief as to the truth
14 of the allegations contained in paragraph 189 of the Complaint, and on that basis denies them.

15 190. Feig is without sufficient knowledge or information to form a belief as to the truth
16 of the allegations contained in paragraph 190 of the Complaint, and on that basis denies them.

17 191. Feig denies the allegations contained in paragraph 191 of the Complaint.

18 192. Feig denies the allegations contained in paragraph 192 of the Complaint.

19 193. Feig denies the allegations in paragraph 193 of the Complaint.

20 **SECOND CLAIM FOR RELIEF**

21 **(Avoidance, Recovery, and Preservation of Two Year Constructive Fraudulent Transfers)**

22 194. In response to paragraph 194 of the Complaint, Feig incorporates his responses to
23 paragraphs 1 through 193 as though set forth in full.

24 195. Feig is without sufficient knowledge or information to form a belief as to the truth
25 of the allegations contained in paragraph 195 of the Complaint, and on that basis denies them.

26 196. Feig is without sufficient knowledge or information to form a belief as to the truth
27 of the allegations contained in paragraph 196 of the Complaint, and on that basis denies them.
28

197. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 197 of the Complaint, and on that basis denies them.

198. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 198 of the Complaint, and on that basis denies them.

199. Feig denies the allegations contained in paragraph 199 of the Complaint.

200. Feig denies the allegations contained in paragraph 200 of the Complaint.

201. Feig denies the allegations contained in paragraph 201 of the Complaint.

202. The allegations contained in paragraph 202 of the Complaint do not require an answer because they are statements of law. To the extent an answer is required, Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 202 of the Complaint, and on that basis denies them.

THIRD CLAIM FOR RELIEF

(Demand for Accounting)

203. In response to paragraph 203 of the Complaint, Feig incorporates his responses to paragraphs 1 through 202 as though set forth in full.

204. The allegations contained in paragraph 204 of the Complaint do not require an answer because they are statements of law. To the extent an answer is required, Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 204 of the Complaint, and on that basis denies them.

205. The allegations contained in paragraph 205 of the Complaint do not require an answer because they are statements of law. To the extent an answer is required, Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 205 of the Complaint, and on that basis denies them.

206. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 206 of the Complaint, and on that basis denies them.

207. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 207 of the Complaint, and on that basis denies them.

1 208. Feig is without sufficient knowledge or information to form a belief as to the truth
2 of the allegations contained in paragraph 208 of the Complaint, and on that basis denies them.

3 209. Feig is without sufficient knowledge or information to form a belief as to the truth
4 of the allegations contained in paragraph 209 of the Complaint, and on that basis denies them.

5 210. Feig denies the allegations in paragraph 210 of the Complaint.

6 **FOURTH CLAIM FOR RELIEF**

7 **(Turnover of Estate Property)**

8 211. In response to paragraph 211 of the Complaint, Feig incorporates his responses to
9 paragraphs 1 through 210 as though set forth in full.

10 212. Feig denies the allegations contained in paragraph 212 of the Complaint.

11 213. Feig is without sufficient knowledge or information to form a belief as to the truth
12 of the allegations contained in paragraph 213 of the Complaint, and on that basis denies them.

13 214. Feig denies the allegations contained in paragraph 214 of the Complaint.

14 215. Feig denies the allegations contained in paragraph 215 of the Complaint.

15 216. Feig denies the allegations in paragraph 216 of the Complaint.

16 217. Feig is without sufficient knowledge or information to form a belief as to the truth
17 of the allegations contained in paragraph 217 of the Complaint, and on that basis denies them.

18 218. Feig is without sufficient knowledge or information to form a belief as to the truth
19 of the allegations contained in paragraph 218 of the Complaint, and on that basis denies them.

20 219. Feig denies the allegations contained in paragraph 219 of the Complaint.

21 **FIFTH CLAIM FOR RELIEF**

22 **(Fraud and/or Conversion/Theft Committed by World Global, Dembitzer, Feig, the Alter**
23 **Egos, the Dembitzer Alter Egos – the Fraudulent ACH Transactions)**

24 220. In response to paragraph 220 of the Complaint, Feig incorporates his responses to
25 paragraphs 1 through 219 as though set forth in full.

26 221. Feig denies the allegations in paragraph 221 of the Complaint.

222. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 222 of the Complaint, and on that basis denies them.

223. Feig denies the allegations in paragraph 223 of the Complaint.

224. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 224 of the Complaint, and on that basis denies them.

225. Feig denies the allegations in paragraph 225 of the Complaint.

226. Feig denies the allegations contained in paragraph 226 of the Complaint.

227. Feig denies the allegations in paragraph 227 of the Complaint.

228. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 228 of the Complaint, and on that basis denies them.

229. Feig denies the allegations in paragraph 229 of the Complaint.

230. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 230 of the Complaint, and on that basis denies them.

231. Feig denies the allegations in paragraph 231 of the Complaint.

SIXTH CLAIM FOR RELIEF

(Fraud and/or Conversion/Theft Committed by World Global, Dembitzer, Feig, the Alter Egos, the Dembitzer Alter Egos – Unreimbursed Funds from the MCA Agreements and ACH Agreement)

232. In response to paragraph 232 of the Complaint, Feig incorporates his responses to paragraphs 1 through 231 as though set forth in full.

233. Feig denies the allegations in paragraph 233 of the Complaint.

234. Feig denies the allegations in paragraph 234 of the Complaint.

SEVENTH CLAIM FOR RELIEF

(Aiding and Abetting Fraud and/or Conversion/Theft by Optimum and Gubin)

235. In response to paragraph 235 of the Complaint, Feig incorporates his responses to paragraphs 1 through 234 as though set forth in full.

236. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 236 of the Complaint, and on that basis denies them.

237. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 237 of the Complaint, and on that basis denies them.

238. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 238 of the Complaint, and on that basis denies them.

239. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 239 of the Complaint, and on that basis denies them.

240. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 240 of the Complaint, and on that basis denies them.

241. Feig denies the allegations in paragraph 241 of the Complaint.

242. Feig denies the allegations in paragraph 242 of the Complaint.

243. Feig denies the allegations in paragraph 243 of the Complaint.

EIGHTH CLAIM FOR RELIEF

(Aiding and Abetting by Defendants Optimum and Gubin)

244. In response to paragraph 244 of the Complaint, Feig incorporates his responses to paragraphs 1 through 243 as though set forth in full.

245. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 245 of the Complaint, and on that basis denies them.

246. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 246 of the Complaint, and on that basis denies them.

247. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 247 of the Complaint, and on that basis denies them.

248. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 248 of the Complaint, and on that basis denies them.

249. Feig is without sufficient knowledge or information to form a belief as to the truth of the allegations contained in paragraph 249 of the Complaint, and on that basis denies them.

1 250. Feig denies the allegations in paragraph 250 of the Complaint.

2 **NINTH CLAIM FOR RELIEF**

3 **(Conspiracy to Commit Fraud)**

4 251. In response to paragraph 251 of the Complaint, Feig incorporates his responses to
5 paragraphs 1 through 250 as though set forth in full.

6 252. Feig denies the allegations in paragraph 252 of the Complaint.

7 253. Feig denies the allegations in paragraph 253 of the Complaint.

8 254. Feig denies the allegations in paragraph 254 of the Complaint.

9 255. Feig denies the allegations in paragraph 255 of the Complaint.

10 256. Feig is without sufficient knowledge or information to form a belief as to the truth
11 of the allegations contained in paragraph 256 of the Complaint, and on that basis denies them.

12 257. Feig denies the allegations in paragraph 257 of the Complaint

13 **RESERVATION OF RIGHTS**

14 258. Paragraph 258 of the Complaint contains a purported reservation of rights to
15 which no response is required. However, to the extent a response is, in fact, required, Feig
16 denies that Plaintiff may bring other claims or causes of action against Feig.

17 **PRAYER FOR RELIEF**

18 259. The remainder of the Complaint contains a “Prayer” for relief to which no
19 response is required. However, to the extent a response is, in fact, required, Feig denies that
20 Plaintiff has any viable claims or causes of action against it or that Plaintiff is entitled to any
21 relief against it (whether included in the “Prayer” or otherwise).

22 **FIRST AFFIRMATIVE DEFENSE**

23 **(Failure to State a Claim)**

24 260. For a separate and first affirmative defense to the Complaint, and to each and
25 every purported claim for relief against Feig contained therein, Feig alleges that the Complaint
26 fails to state a claim upon which relief can be granted against Feig.
27
28

SECOND AFFIRMATIVE DEFENSE

(Estoppel)

261. For a separate and second affirmative defense to the Complaint, and to each and every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's claims are barred by the doctrine of estoppel.

THIRD AFFIRMATIVE DEFENSE

(Laches)

262. For a separate and third affirmative defense to the Complaint, and to each and every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's claims are barred by the doctrine of laches.

FOURTH AFFIRMATIVE DEFENSE

(Waiver)

263. For a separate and fourth affirmative defense to the Complaint, and to each and every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's claims are barred by the doctrine of waiver.

FIFTH AFFIRMATIVE DEFENSE

(Bad Faith)

264. For a separate and fifth affirmative defense to the Complaint, and to each and every purported claim for relief against Feig contained therein, Feig alleges that plaintiff commenced this action in bad faith against Feig.

SIXTH AFFIRMATIVE DEFENSE

(Unclean Hands)

265. For a separate and sixth affirmative defense to the Complaint, and to each and every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's claims are barred by the doctrine of unclean hands.

SEVENTH AFFIRMATIVE DEFENSE

(Unconscionability)

1 266. For a separate and seventh affirmative defense to the Complaint, and to each and
2 every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's claims
3 are barred by the doctrine of unconscionability.

4 **EIGHTH AFFIRMATIVE DEFENSE**

5 **(Equity)**

6 267. For a separate and eighth affirmative defense to the Complaint, and to each and
7 every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's claims
8 are barred by common law and/or principles of equity.

9 **NINTH AFFIRMATIVE DEFENSE**

10 **(Debtor's Own Conduct)**

11 268. For a separate and ninth affirmative defense to the Complaint, and to each and
12 every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's
13 damages, if any, were the direct and proximate result of the debtor's own conduct.

14 **TENTH AFFIRMATIVE DEFENSE**

15 **(Unrelated, Pre-Existing, or Subsequent Conditions**

16 **Unrelated to Feig's Conduct)**

17 269. For a separate and tenth affirmative defense to the Complaint, and to each and
18 every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's
19 damages, if any, were the result of unrelated, pre-existing, or subsequent events unrelated to
20 Feig's conduct.

21 **ELEVENTH AFFIRMATIVE DEFENSE**

22 **(Failure to Mitigate Damages)**

23 270. For a separate and eleventh affirmative defense to the Complaint, and to each and
24 every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's
25 damages, if any, were the result of the debtor's failure to mitigate damages.

26 **TWELFTH AFFIRMATIVE DEFENSE**

27 **(Accord and Satisfaction)**

1 271. For a separate and twelfth affirmative defense to the Complaint, and to each and
2 every purported claim for relief against Feig contained therein, Feig alleges that plaintiff's
3 damages, if any, must be reduced by the amount of any payments made to plaintiff and/or the
4 debtor by any collateral sources, including to the extent the debtor has released, settled, entered
5 into an accord and satisfaction, or otherwise compromised its claims by any means.

6 **THIRTEENTH AFFIRMATIVE DEFENSE**

7 **(Adequate Remedy At Law)**

8 272. For a separate and thirteenth affirmative defense to the Complaint, and to each
9 and every purported claim for relief against Feig contained therein based in equity, Feig alleges
10 that plaintiff has an adequate remedy at law.

11 **FOURTEENTH AFFIRMATIVE DEFENSE**

12 **(Statutory Compliance)**

13 273. For a separate and fourteenth affirmative defense to the Complaint, and to each
14 and every purported claim for relief against Feig contained therein, Feig alleges that, at all times
15 mentioned in the Complaint, Feig acted in strict compliance with applicable state and federal
16 law.

17 **FIFTEENTH AFFIRMATIVE DEFENSE**

18 **(Good Faith of Feig)**

19 274. For a separate and fifteenth affirmative defense to the Complaint, and to each and
20 every purported claim for relief against Feig contained therein, Feig alleges that, at all times
21 mentioned in the Complaint, they acted in good faith and without knowledge of the voidability of
22 the transfers and in compliance with title 11 of the United States Code including, without
23 limitation, 11 U.S.C. § 550 and applicable state law.

24 **SIXTEENTH AFFIRMATIVE DEFENSE**

25 **(Reasonably Equivalent Value)**

275. For a separate and sixteenth affirmative defense to the Complaint, and to each and every purported claim for relief against Feig contained therein, Feig alleges that at the times of the alleged transfers, Feig provided reasonably equivalent value to the Debtor for same.

SEVENTEENTH AFFIRMATIVE DEFENSE

(Right to Assert Affirmative Defenses)

276. For a separate and seventeenth affirmative defense to the Complaint, and to each and every purported claim for relief against Feig contained therein, Feig reserves the right to assert additional affirmative defenses based upon further investigation and discovery.

DEMAND FOR JURY TRIAL

Feig hereby demands a trial by jury on all issues triable by a jury and do not consent to a jury trial conducted by the bankruptcy court.

WHEREFORE, Feig prays for judgment as follows:

1. That plaintiff take nothing by his Complaint;
2. That plaintiff be denied all relief sought;
3. For costs of suit herein; and
4. For such other and further relief as this Court deems just and proper.

Dated: May 12, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Ira D. Kharasch

Ira D. Kharasch

Victoria A. Newmark

Attorneys for Defendant Solomon Feig.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
700 Louisiana St, Suite 4500, Houston, TX 77002

A true and correct copy of the foregoing document entitled (*specify*): **DEFENDANT SOLOMON FEIG'S ANSWER TO COMPLAINT AND DEMAND FOR JURY TRIAL** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **May 12, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Joseph Boufadel** jboufadel@salvatoboufadel.com, Gsalvato@salvatoboufadel.com;gsalvato@ecf.inforruptcy.com
- **Christopher Ghio** Christopher.Ghio@dinsmore.com, angelica.urena@dinsmore.com
- **Karen Hockstad** karen.hockstad@dinsmore.com, kim.beavin@dinsmore.com
- **Ira David Kharasch** ikharasch@pszjlaw.com
- **Michael Lundholm** mlundholm@londonstoutlaw.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Victoria Newmark** vnewmark@pszjlaw.com, hdaniels@pszjlaw.com;bdassa@pszjlaw.com;hwinograd@pszjlaw.com
- **Brian A Paino** bpaino@hinshawlaw.com, hmosothoane@hinshawlaw.com;crico@hinshawlaw.com
- **Matthew Sommer** matthew.sommer@dinsmore.com, carrie.davis@dinsmore.com
- **United States Trustee (SA)** ustregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

05/12/2025
Date

Hope R. Daniels
Printed Name

/s/ Hope R. Daniels
Signature